

1 KAREN A. CONNOLLY
2 **KAREN A. CONNOLLY, LTD.**
3 6600 W. Charleston Blvd., Ste. 124
4 Las Vegas, NV 89146
5 Telephone: (702) 678-6700
6 Facsimile: (702) 678-6767
7 E-Mail: advocate@kconnollylawyers.com
8 *Attorney for Jan Rouven Fuechtener*

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 JAN ROUVEN FUECHTENER,

12 Defendant.

2:16-CR-100-GMN-CWH

ERRATA TO RESPONSE TO
GOVERNMENT'S MOTION FOR AN
ORDER DEEMING ATTORNEY
CLIENT PRIVILEGE WAIVED
(DOC#204)

13 COMES NOW Defendant, JAN ROUVEN FUECHTENER, by and through his attorney of
14 record, KAREN A. CONNOLLY, of the law office of KAREN A. CONNOLLY, LTD., and submits
15 this *Errata to Response to Government's Motion for an Order Deeming Attorney Client Privilege*
16 *Waived (Doc#204)*. Pages 3 through 14 were attached in error. The corrected response is attached
17 hereto.

18 DATED this 7 day of July 2017.

19 **KAREN A. CONNOLLY, LTD.**

20 
21 _____
22 KAREN A. CONNOLLY
23 6600 W. Charleston Blvd., Ste. 124
24 Las Vegas, NV 89146
25
26
27
28

KAREN A. CONNOLLY, LTD.

Karen A. Connolly
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146
Telephone: (702) 678-6700 Facsimile: (702) 678-6767

KAREN A. CONNOLLY, LTD.

Karen A. Connolly

6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146
Telephone: (702) 678-6700 Facsimile: (702) 678-6767

1 KAREN A. CONNOLLY
2 **KAREN A. CONNOLLY, LTD.**
3 6600 W. Charleston Blvd., Ste. 124
4 Las Vegas, NV 89146
5 Telephone: (702) 678-6700
6 Facsimile: (702) 678-6767
7 E-Mail: advocate@kconnollylawyers.com
8 *Attorney for Jan Rouven Fuechtener*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 JAN ROUVEN FUECHTENER,

12 Defendant.

CASE NO.: 2:16-CR-100-GMN-CWH

RESPONSE TO GOVERNMENT'S
MOTION FOR AN ORDER DEEMING
ATTORNEY CLIENT PRIVILEGE
WAIVED

13
14 Defendant herein, JAN ROUVEN FUECHTENER, by and through his attorney of record,
15 KAREN A. CONNOLLY, of the law office of KAREN A. CONNOLLY, LTD., and in responding
16 to the Government's motion for an order deeming privilege waived and responds that he agrees that
17 given the fact that he has moved to withdraw his guilty plea, there should be a limited waiver of the
18 attorney client privilege in regard to communications he had with the named attorneys in regard to
19 the guilty plea only.

20 ///

21 ///

22 ///

1 In the motion the government states that Rouven alleges that the failure of his attorneys to
 2 provide accurate information about the consequences of his plea rendered it coercive. For
 3 clarification, Rouven asserts that based upon the failure of his attorneys to properly advise him as
 4 to the consequences of his plea, it was not knowing and voluntarily entered . He also asserts that
 5 based upon the attenuating circumstances discussed in the motion to withdraw the plea, it was also
 6 coerced.

7 DATED this 12th day of July, 2017.

8 **KAREN A. CONNOLLY, LTD.**

9
 10 /s/ Karen A. Connolly
 11 KAREN A. CONNOLLY
 12 6600 W. Charleston Blvd., Ste. 124
 13 Las Vegas, NV 89146
 14 Telephone: (702) 678-6700
 15 *Attorney for Jan Rouven Fuechtener*

13 ///

14 ///

KAREN A. CONNOLLY, LTD.

Karen A. Connolly
 6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146
 Telephone: (702) 678-6700 Facsimile: (702) 678-6767

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of KAREN A. CONNOLLY, LTD., and on the 17th day of July, 2017, I served a true and correct copy of the above and foregoing *Errata to Response to Government's Motion for an Order Deeming Attorney Client Privilege Waived* via the CM/ECF system upon the following:

Cristina D. Silva, United States Attorney
Daniel D. Hollingsworth, United States Attorney
Elham Roohani, United States Attorney
Lisa Cartier-Giroux, United States Attorney
Mark E. Woolf, United States Attorney

/s/ Shaeley Pilayo
an Employee of KAREN A. CONNOLLY, LTD.

KAREN A. CONNOLLY, LTD.

Karen A. Connolly
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146
Telephone: (702) 678-6700 Facsimile: (702) 678-6767